

AO 91 (Rev. 11/11) Criminal Complaint

Sealed
Public and unofficial staff access
to this instrument are
prohibited by court order

UNITED STATES DISTRICT COURT

for the
Southern District of Texas

United States Courts
Southern District of Texas
FILED

April 30, 2021

Nathan Ochsner, Clerk of Court

United States of America

v.

Aryion Dupree Jackson

Case No.

4:21mj0972

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2019 through October 2019 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 1591

Sex Trafficking of Minors or with Force, Fraud or Coercion

This criminal complaint is based on these facts:

See Attached Affidavit

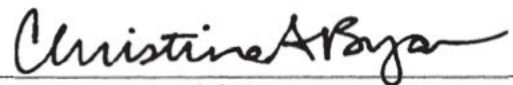
☒ Continued on the attached sheet.


Complainant's signature

Bethany Morris, Special Agent FBI

Printed name and title

Sworn to before me telephonically.

Date: April 30, 2021


Judge's signature

City and state: Houston, Texas

Christina A. Bryan, US Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Bethany Morris, being duly sworn, hereby depose and state the following:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI). I have been a Special Agent of the FBI since December 2012. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest, and performing other duties imposed by law. During my assignment with the FBI, I have participated in the execution of search warrants for documents and other evidence, including computers and electronic media, in cases involving child pornography and the sexual exploitation of children. I have investigated multiple cases involving child pornography and the sexual exploitation of children. I have also participated in various FBI mandated training for the investigation and enforcement of federal child pornography laws in which computers are used as the means for receiving, transmitting, and storing child pornography as defined in Title 18, United States Code, Section 2256. I have also participated in numerous investigations and trainings related to Human Trafficking offenses.
2. This Affidavit is made in support of a criminal complaint charging Aryion Dupree Jackson, with violating 18 U.S.C. § 1591(a)(1) and (a)(2), (b)(2) which makes it a crime for someone who benefits, financially, or by receiving anything of value, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.

3. I am familiar with the information contained in the Affidavit based upon the investigation that myself and other law enforcement officers have conducted, and any of my conversations with other parties involved in this case.
4. Because the Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of a violation of 18 U.S.C. 1591 has been committed by Aryion Dupree Jackson starting from August 2019 through October 2019. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.
5. Your Affiant learned the following information by speaking with Deputy Cecilia Colunga and Deputy Ryan Hottman, Investigators for the Harris County Constable's Office, Precinct (Pct.) 5, as well as reviewing all the associated offense reports:
6. In September 2019, Minor Victim 1¹ (MV1) (DOB 2/20/2005) was reported as a runaway by Baytown Police Department. On September 28, 2019, Pct. 5 recovered MV1 during a traffic stop. MV 1 claimed to be working at an adult entertainment venue and had in her possession a fake New Jersey driver's license stating she was 19 years of age. A forensic interview was scheduled with her for a date in the near future.
7. On October 9, 2019, at that forensic interview, MV1 stated she was in a long-term relationship with and individual she identified as Aryion Jackson (Aryion). MV1 traveled with Aryion out of state for his rap concerts. MV1 stated that Aryion knew MV1's age.

¹ The identification of MV1 is known to law enforcement but is not being disclosed in this document to protect the identity of MV1.

8. During an interview with law enforcement, MV1 recalled an incident on “the blade²” where she was being harassed by another pimp and had to call Aryion to come and tell the other pimp to leave her alone.
9. In a consensual review of the contents of MV1’s cell phone, SA Morris located the following written in the notes section, dated 9/2/2019: “You know I love you with all my heart...I love making money with you and all that...you tell me im yo bottom bitch & this and that but you telling other females that too &.... I have so many homeboys that be pimpin & they treat they main bitch like the ONLY bitch in the world!... I’m starting to believe I’m not even yo main im feelin like you tell every bitch they yo main... And don’t come at me with “I gotta treat all y’all girls the same” because I am NOT any of them females!! AT ALL ARYION!!...[SIC]
10. On September 2, 2019, a text message was sent from MV1’s cell phone which said “Aryion said he ready for u to be on the tram” “team*”. The response to that message was “Shiiid I’m ready too” [SIC]
11. On September 2, 2019, MV1 sent the following text messages: “He used to be like that, but everything changed once we got more girls on the team”. “We have NINE girls living here”. “Plus the other P & his female too”.
12. A review of Aryion’s Instagram page, there were multiple posts advertising that he is a pimp, such as the following:
 - a. “MFS DOIN WATEVER 4 MY ATTENTION (P emoji³) (laughing emojis)
FAKE PAGES N ALL BITCH JUS CUM HOME...PAY D FEE THO...” [SIC]

² The blade is a slang term commonly used to refer to the location where prostitution is known to occur. In the Houston area, this location is the Bissonnette area.

³ The P emoji is known to be commonly used to identify a person as a pimp.

- b. “Ima (P emoji) bitch yu kno I got fees on it!!”
 - c. On a photo of stacks of \$20 dollar bills, \$100 dollar bills and \$1 dollars bills are the following words: “Just from last night...She did her shit last night No Cap (P emoji)...”
 - d. On a photo of Aryion, written at the bottom is the following: “BIG (P emoji)”.
13. On November 1, 2019, a message was sent from MV1’s Instagram account to Aryion’s Instagram saying: “ICant Pay Daddy⁴If He Dnt Txt Bacc” [SIC].
14. In March 2018, Minor Victim 2⁵ (MV2) (DOB 08/21/2004) ran away from home.
15. On October 21, 2019, Pct 5 deputies were dispatched to a minor crash on the West Sam Houston Parkway. MV2 was identified as a passenger in one of the vehicles involved in the minor crash.
16. On October 22, 2019, after MV2 was transported to the Pct 5, MV2 made an outcry to law enforcement stating that MV2 had been trafficked by an individual she identified as Aryion Jackson (Aryion). MV2 stated that MV2 met Aryion on Instagram in July 2019. MV2 relayed that Aryion told MV2 that he did not consider himself a pimp, he considered himself a player.
17. In August 2019, MV2 met Aryion in person for the first time. MV2 reported that Aryion activated her location settings on MV2’s cellular phone and shared it with his phone. MV2 stated that Aryion told MV2 that he wanted them to make money together. MV2 indicated Aryion sent a ride share service to pick MV2 up at MV2’s residence and take MV2 to his location.

⁴ Daddy is an endearing term that prostitutes use to refer to their pimp.

⁵ MV2’s identity is known to law enforcement but is not being disclosed in this document to protect the identity of MV2.

18. MV2 lived with Aryion, along with seven to 12 other minor and adult women who were also engaging in commercial sex, one of which MV2 knew to be underage. MV2 believed that the two males living at what she referred to as a trap house⁶ were Aryion's partners. MV2 reported that Aryion had fake identification cards made for all the minor and adult women engaging in commercial sex.
19. MV2 relayed Aryion, put MV2 to work on the blade to engage in commercial sex. MV2 reported Aryion gave MV2 drugs to take to keep MV2 working. MV2 engaged in commercial sex dates at the motel located near Plainfield Drive and Bissonnette Street, Houston, Texas or in nearby parking lots. MV2 stated Aryion physically abused MV2 on multiple occasions for not following his instructions.
20. MV2 reported the following: Aryion gave MV2 a quota of \$1000 per day. Aryion told MV2 to charge "Johns"⁷ between \$100 and \$300 for various commercial sex acts. Aryion took all the money that MV2 made engaging in commercial sex dates. If the women/minors failed to make the quota, Aryion would tell them to get back to work or get their ass beat.
21. MV2 reported Aryion threatened to kill or harm the women/minors or their families if they left him. MV2 reported Aryion did not provide food for the women/minors but regularly provided them with drugs to keep them working.
22. MV2 stated, in September 2019, Aryion pointed a handgun at MV2's head and threatened to shoot MV2 if MV2 did not follow his instructions.

⁶ A trap house is commonly referred to a house used to sell drugs.

⁷ John is a slang term commonly used to refer to a customer in commercial sex.

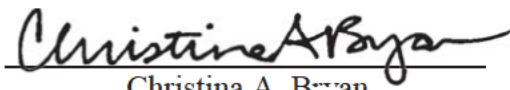
23. Law Enforcement officers observed MV1 at the trap house with Aryion. MV1 stated that she met MV2 at the trap house with Aryion. MV2 stated that she met MV1 at the trap house with Aryion.
24. Aryion Jackson is documented as a known gang member by Baytown Police Department and Harris County Sheriff's department.

CONCLUSION

25. Based upon the information set forth above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Aryion Dupree Jackson with violation of 18 U.S.C. § 1591(a)(1), (b)(1) and (b)(2), which makes it a crime for someone who benefits financially, or by receiving anything of value, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.


Bethany Morris

SUBSCRIBED TO AND SWORN TELEPHONICALLY on April 30, 2021.


Christina A. Bryan
United States Magistrate Judge